

### **R E M A R K S**

Claims 1 – 24 are currently pending in the present application. With this Response, Applicants amend claims 9, 17, 22 and 23. No new matter is introduced.

#### REJECTION UNDER 35 U.S.C. §§ 102, 103

Claims 1 – 3, 5, 6, 8 – 11, 13, 14, 16, 17, 19, 20 and 22 – 24 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,069,890 to White et al. Claims 7 and 15 are rejected under 35 U.S.C. § 103(a) as being unpatentable over White in view of U.S. Patent No. 6,389,005 to Cruickshank. Applicant amends claims 9, 17, 22 and 23 to further clarify the nature of his invention, and respectfully traverses these rejections.

White discloses a system and method for providing telephone services via the Internet. As illustrated for example by FIGs. 4 and 5, the system of White employs a gateway router 104 for detecting a call set-up request from LEC network 102, and an Internet address database 112 connected to the gateway router 104 for receiving and responding to an address look-up request from router 104. Upon receiving the response from database 112, router 104 routes the packet to a destination network.

The system disclosed by White is equivalent to Applicant's described first prior art method, in which a voice gateway to the IP network (comparable to White's gateway router 104) holds a table (comparable to White's database 112) for address determination (see, e.g., page 1, line 22 through page 2, line 24 of Applicant's specification). This approach suffers the disadvantage of requiring a full address database to be maintained at each voice gateway.

By way of contrast, Applicant discloses a system of hierarchically arranged voice gateways including "child" voice gateways 64, 66 and "parent" voice gateways 60, 62 (see, e.g., Applicant's FIG. 2). Child voice gateways 64, 66 interface directly with non-IP networks (like White's gateway router 104), while parent voice gateways 60, 62 do not. Parent voice gateways 60, 62 instead function to provide route selection information in support of routing between child voice gateways 60, 62.

With reference to Applicant's FIG. 2, for example, in response to a voice call placed via switching office 70, child voice gateway 64 transmits a destination inquiring message including a destination number and a transport (IP) address of the originator. Parent voice gateway 60 receives the inquiring message, and correlates the destination number with a steering number of the gateway 60 to recognize that parent voice gateway 60 is capable of identifying a transport address for the destination number. Parent voice gateway 60 identifies a destination transport address of child voice gateway 66, and forwards the destination inquiring message to child voice gateway 66. Child voice gateway 66 prepares a destination determination message to the source transport address (see, e.g., Applicant's specification at page 14, line 8 through page 17, line 31).

This hierarchically-arranged system of voice gateways is reflected in each of Applicant's independent claims 1, 9, 17 and 22 – 24. For example, in independent claims 1 and 24, Applicant claims "first voice gateways" corresponding to the child voice gateways, and "second voice gateways" corresponding to the parent voice gateways. In claims 9 and 22, Applicant claims a

“voice gateway” corresponding to a child voice gateway, and a “predetermined voice gateway” corresponding to a parent gateway. In claims 17 and 23, Applicant claims a “voice gateway” corresponding to a parent voice gateway, and an “originating voice gateway” corresponding to a child voice gateway. In each of independent claims 1, 9, 17 and 22 –24, an originating (child) voice gateway generating a destination inquiring message in response to a call setup request transmits the destination inquiring message to another (parent) voice gateway in order to determine a route to a destination voice gateway for forwarding the destination inquiring message.

White fails to disclose Applicant’s claimed system. Although it is suggested that White’s<sup>1</sup> Internet database 112 is equivalent to the second voice gateway, Internet database 112 is clearly not a voice gateway, and does not function in the manner claimed by Applicant with regard to the functioning of the parent voice gateway. These unique features of Applicant’s claimed invention are similarly not disclosed or suggested by Cruickshank.

Accordingly, Applicants submit that independent claims 1, 9, 17 and 22 - 24 are not anticipated by White, and are therefore in condition for allowance. As dependent claims 2, 3, 5 – 8, 10 , 11, 13 – 16, 19 and 20 each depend from one of allowable claims 1, 9 and 17, Applicants further submit that claims 2, 3, 5 – 8, 10 , 11, 13 – 16, 19 and 20 are allowable for at least this reason.

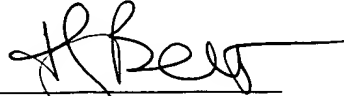
## CONCLUSION

In view of the amendments and set forth above, this application is in condition for allowance which action is respectfully requested. However, if for any reason the Examiner should consider this application not to be in condition for allowance, the Examiner is respectfully

requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

Any fee due with this paper may be charged to Deposit Account No. 50-1290.

Respectfully submitted,



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